

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA :
:
v. : **CRIMINAL No.: 3:15-cr-00319-RS**
:
SHAUN BRIDGES :
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**DEFENDANT BRIDGES' MOTION
FOR EARLY TERMINATION OF ELECTRONIC MONITORING**

Comes Now Shaun Bridges, by and through his counsel, Steven H. Levin, and respectfully requests this Honorable Court enter an order directing the United States Probation Office to terminate electronic monitoring on Thursday, January 28, 2016. As grounds in support thereof, undersigned counsel states as follows:

- 1) The Bureau of Prisons has designated Mr. Bridges to the minimum-security camp at FCI Berlin, New Hampshire;
- 2) Mr. Bridges' reporting date to FCI Berlin is Friday, January 29, 2016, at 12:00pm;
- 3) FCI Berlin, New Hampshire, is located approximately 10 hours from Mr. Bridges' current residence in Maryland by car;
- 4) Mr. Bridges is currently on electronic monitoring, which the United States Probation Officer has advised will not cease—absent a court order—until Mr. Bridges' reporting date;
- 5) As a practical matter, Mr. Bridges cannot depart Maryland on January 29, 2016, and arrive at FCI Berlin by noon on that same day.
- 6) Mr. Bridges proposes the following itinerary, should this Court grant the motion:
 - a) On Thursday, January 28, 2016, at approximately 9:00am, Mr. Bridges' mother-in-law will drive him from his home to the United States Probation Office in Baltimore,

Maryland;

- b) The Probation Officer will remove his ankle bracelet;
- c) With his mother-in-law, Mr. Bridges will depart for New Hampshire at approximately 10:00 am by car;
- d) Anticipating an arrival at approximately 7:00 pm, depending on weather and road conditions; Mr. Bridges, still with his mother-in-law, will check into a hotel in Nashua, New Hampshire;¹
- e) On January 29, 2016, Mr. Bridges's mother-in-law will drive him to FCI Berlin.

CONCLUSION

For the reasons stated above, Mr. Bridges respectfully requests this Court grant his motion for termination of electronic monitoring on Thursday, January 28, 2016.

Respectfully submitted,

/s/
Steven H. Levin (Fed Bar #28750)
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Pro Hac Vice

¹ Mr. Bridges will provide the specific hotel information to his probation officer in a non-public forum, should this motion be granted.

It is so ORDERED, this ____ day of January, 2016

Judge Richard G. Seeborg
United States District Judge
Northern District of California